

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**UNITED STATES OF AMERICA**

**v.**

**CONCORD MANAGEMENT AND  
CONSULTING LLC,**

**Defendant.**

**Crim. No. 18-CR-32-2 (DLF)**

**PARTIES' JOINT MOTION FOR SCHEDULING ORDER**

The United States of America and Concord Management and Consulting LLC propose the attached pretrial scheduling order based on the template provided by the Court on August 16, 2019 (Doc. 180).<sup>1</sup>

Respectfully submitted,

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<sup>1</sup> In agreeing to this schedule neither party waives its right to file any additional pleadings that may be required to protect its rights.

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**v.**

**CONCORD MANAGEMENT AND  
CONSULTING LLC,**

**Defendant.**

**Crim. No. 18-CR-32-2 (DLF)**

**SCHEDULING ORDER**

It is ORDERED that the following schedule shall apply in this case:

1. The defendant shall file any motion(s) to suppress by December 2, 2019. The government's opposition(s) shall be filed by December 16, 2019. The defendant's reply/replies shall be filed by December 23, 2019.
2. The government shall complete any final discovery and provide *Brady* notice by October 18, 2019.
3. The parties shall jointly file proposed jury instructions and verdict form by October 21, 2019. The joint filing shall specify the instructions on which the parties agree and the instructions on which the parties disagree, with specific objections noted below each disputed instruction and supporting legal authority.
4. The defense shall file a Motion to Strike Surplusage by November 1, 2019. The government's opposition shall be filed by November 15, 2019, and defendant's reply shall be filed by November 22, 2019.

5. The defense shall file any additional Motion to Dismiss within thirty days of the Court's ruling on the Motion to Supplemental Bill of Particulars or the government's filing of a Supplemental Bill of Particulars, whichever is later.
6. The parties shall provide expert notice by January 15, 2020.
7. The government shall provide Rule 404(b) notice by January 15, 2020. The defendant shall respond to any Rule 404(b) notice by February 12, 2020.
8. The government shall provide the defense with an exhibit list, copies of exhibits, and proposed translations by January 15, 2020.
9. The government shall file any motion under the Classified Information Procedures Act by January 22, 2020.
10. The parties shall jointly file a proposed *voir dire* and jury questionnaire by January 29, 2020. The joint filing shall specify the questions on which the parties agree, and the questions on which the parties disagree, with specific objections noted below each disputed question and supporting legal authority.
11. The government shall provide the defense with a witness list and any *Giglio* and *Jencks* material by February 3, 2020.
12. The defense shall provide the government with a witness list, exhibit list, copies of exhibits, proposed translations of exhibits, and any objections to the government's proposed translations by February 10, 2020. The government shall provide the defense with any objections to the defense's proposed translations by March 9, 2020.
13. Each party shall serve any expert reports by February 14, 2020. Motions to Exclude Experts shall be filed by March 2, 2020. Oppositions shall be filed by March 16, 2020. Replies shall be filed by March 23, 2020.

14. Motions in limine shall be filed by February 19, 2020. Oppositions to motions in limine shall be filed by March 4, 2020. Replies shall be filed by March 11, 2020.

15. Any stipulations shall be filed by March 2, 2020.

16. The Court will hold a pretrial conference on March 23, 2020.

17. Trial will begin on April 6, 2020. The parties anticipate a four week trial.

SO ORDERED.

DABNEY FRIEDRICH  
United States District Judge

Dated: \_\_\_\_\_